## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

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§	No. 1:20-CR-232-RP (2)
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## FACTUAL BASIS FOR GUILTY PLEA

Defendant agrees that the Government's evidence at trial would have established the following facts, which are true and correct, proving beyond a reasonable doubt each of the elements of the crime charged. Defendant agrees the government is prepared to present evidence that would prove beyond a reasonable doubt each of the facts stated in this Factual Basis, and each of the elements of the offense alleged in Count Two of the Indictment. Count Two charges the Defendant, **KRYSTAL SHERMAN** ("Defendant" or "Ms. Sherman") with a violation of Title 18, United States Code, Section 1708, Possession of Stolen Mail.

Krystal Sherman was previously in a relationship with co-defendant Jamar Augustin (Mr. Augustin) and was aware of his ongoing mail theft and other illegal activities. On or about December 4, 2019, Ms. Sherman was approached by Austin Police Officers while she was in a vehicle that had been reported stolen. Mr. Augustin had previously left the scene with the keys to the vehicle. Found in the vehicle and in Ms. Sherman's possession were pieces of stolen mail.

United States Postal Inspection Services investigated and confirmed that multiple pieces of the mail found in the possession of Ms. Sherman was in fact stolen. Specifically, Ms. Sherman did conceal and unlawfully have in her possession mail addressed to the following persons:

	VICTIM	ADDRESS ON MAIL	DESCRIPTION OF MAIL
1	Victim A.F.	APT **** N FM 620 Austin, TX	Two (2) RBFCU debit card mailers
2	Victim W.L.	N/A	Chase card ending in 8541.
3	Victim K.N.	N/A	Chase Southwest card beginning
			with4147
4	Victim A.S.	****E Oltorf St. APT****Austin, Tx	Bank of America Visa card mailer
5	Victim B.S.	****Appomattox Drive Austin, Tx	Chase debit card mailer
6	Victim R.S.	N/A	Ashley Homestore credit card
			mailer.
7	Victim L.S.	****N. Hills Dr. APT ***Austin, Tx	Chase Visa debit mailer
8	Victim R.K.	**** Merrywing Cir Austin, TX	Bank of America card mailer
9	Victim K.A.	**** Houston St. APT *** Austin, TX	Chase Slate card mailer
10	Victim H.P.	N/A	CreditOne Bank card mailer
11	Victim N.H.	****Northcross Dr APT****Austin, Tx	Chase Bank card mailer
12	Victim S.V.	****Elmont Dr APT****Austin, TX	Wells Fargo Visa card mailer
13	Victim S.P.	****Timberwood Dr Austin, TX	Chase Amazon Prime Rewards
			Visa card mailer
14	Rocha's	**** Burleson Rd. Austin, TX	Check for payment to Service King
	Towing		placed in the mail
	Service		
15	Victim Z.Z	** Country Oaks Dr. Buda, TX	Best Buy Visa card mailer
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which had been stolen, taken, embezzled, and abstracted from a letter box, post office, mail receptacle, mail route, or mail carrier, which was an authorized depository for mail matter, knowing the

said letter to have been stolen, taken, embezzled, and abstracted from an authorized depository for mail matter, in violation of Title 18, United States Code, Section 1708.

Defendant

## **Certificate of Service**

On July 7, 2021, I filed the foregoing, and served a copy on United States Attorney's Office counsel of record, Keith Henneke, via the Court's Electronic Case File system.

JESUS M. SALINAS, JR. Attorney for Defendant